

EXHIBIT “B”

PLAINTIFF’S RESPONSES TO DEFENDANT’S

REQUEST FOR ADMISSIONS

EFILED IN OFFICE
CLERK OF SUPERIOR COURT
TOWNS COUNTY, GEORGIA
SUCV2023000112
JP
DEC 15, 2023 04:29 PM

Cecil Dye

Cecil Dye, Clerk
Towns County, Georgia

IN THE SUPERIOR COURT OF TOWNS COUNTY
STATE OF GEORGIA

GARY DAVIS,

)

Plaintiff,

)

v.

)

FRANCIS NAVARRE and JOHN
DOES 1 & 2,

)

Defendants.

)

CIVIL ACTION FILE
NO. SUCV2023000112

**PLAINTIFF GARY DAVIS' RESPONSE TO DEFENDANT FRANCIS NAVARRE'S
FIRST REQUESTS FOR ADMISSION**

NOW COMES Gary Davis, Plaintiff herein, and responds to the Defendant's First Interrogatories to Plaintiff as follows:

REQUESTS

1.

Admit that you have been a citizen of Georgia continuously since January 5, 2022.

RESPONSE:

Admit.

2.

Admit that the amount in controversy in this case exceeds the sum or value of \$75,000.00, exclusive of interest and costs.

RESPONSE:

Admit.

3.

If your response to request no. 2 is anything other than an unqualified admission, admit that you or your counsel will not ask a judge or jury to award damages in excess of \$75,000, exclusive of interest and costs.

RESPONSE:

Deny.

4.

If your response to request no. 2 is anything other than an unqualified admission, admit that you will not amend your complaint to seek damages in excess of \$75,000.00, exclusive of interest and costs, after the expiration of one year from the date this case was commenced.

RESPONSE:

Deny.

5.

If your response to request no. 2 is anything other than an unqualified admission, admit that in the event of a verdict or judgment in excess of \$75,000, exclusive of interest and costs, you will agree not to execute on any portion of the verdict or judgment that exceeds \$75,000.00, exclusive of interest and costs.

RESPONSE:

Deny.

6.

If your response to request no. 2 is anything other than an unqualified admission, admit that in the event of a verdict or judgment in excess of \$75,000, exclusive of interest and costs, you will agree that the verdict or judgment shall be satisfied and canceled upon payment of \$75,000.00, exclusive of interest and costs.

RESPONSE:

Deny.

This 15th day of December, 2023.

KENNETH S. NUGGENT, P.C.

/s/ Ahkibah Khan
Ahkibah Khan, Esq.
Georgia Bar No. 416970
Jan P. Cohen
Georgia Bar No. 174337
Attorneys for Plaintiff

1355 Peachtree Street NE
Suite 1000
Atlanta, Georgia 30309
Phone: 404- 253-5830
akhan@attorneykennugent.com
jcohen@attorneykennugent

IN THE STATE COURT OF TOWNS COUNTY
STATE OF GEORGIA

GARY DAVIS, :
: Plaintiff, :
: :
v. : CIVIL ACTION
: FILE NO.: SUCV2023000112
FRANCIS NAVARRE and JOHN :
DOES 1-2, :
: Defendant. :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing *Plaintiff's Response to Defendant's Request for Admission* upon all parties concerned by Statutory Electronic Delivery via email to each counsel of record and depositing same in the United States Mail with sufficient postage thereon to ensure proper delivery as follows:

Jason Darneille, Esq.
Gower, Wooten & Darneille,
LLC
4200 Northside Parkway, NW
Suite 12
Atlanta, GA 30327
jdarneille@gwdlawfirm.com

Marc Bardack, Esq.
Freeman, Mathis & Gary
100 Galleria Parkway, Ste. 1600
Atlanta, GA 30339
mbardack@fmglaw.com

This 15th day of December, 2023.

KENNETH S. NUGGENT, P.C.

1355 Peachtree Street NE
Suite 1000
Atlanta, Georgia 30309
Phone: 404- 253-5830
akhan@attorneykennugent.com
jcoheh@attorneykennugent.com

/s/ Akibah Khan
Akibah Khan, Esq.
Georgia Bar No. 416970
Jan P. Cohen
Georgia Bar No. 174337
Attorneys for Plaintiff